

Maxus Energy Corporation
717 North Harwood Street
Dallas, Texas 75201
214 953-2000

10/20/89
A. 2
Please Reply To:

23200 Chagrin Blvd.
Four Commerce Park Square
Suite 600
Beachwood, OH 44122

U.S. EPA RECORDS CENTER REGION 5



534343

MAXUS

October 20, 1989

Mr. Dave Wilson
CERCLA Enforcement Section SHE-12
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

216 464-7609

Re: Summary of 10/17/89 Meeting
Painesville, Ohio Site

Dear Mr. Wilson:

The purpose of this letter is to summarize our discussions during our meeting in your office October 17, 1989. Please call me if anything below is incorrect, as we are preparing to take action as shown.

- 1.) U.S. EPA has not completed its review of our report submitted July 31, 1989 requesting changes in the ACO covering monitoring activities at this site. I understand that U.S. EPA's Dr. Tsai, who is conducting a detailed review of the analytical protocols, was hospitalized before he completed his review. Although it is now uncertain when Dr. Tsai could complete this work, you hoped to have a response to our July 31, 1989 report within 30 days. If Dr. Tsai's absence will be extended, perhaps an alternate could take over this project to expedite completion. Dr. David Payne, from U.S. EPA Region V's contract laboratory review program, has actual analytical experience at this site, and was involved in the original ACO development. I will be calling you from time to time to check on the status of this matter.
- 2.) I explained that we were seriously considering performing a Practical Quantitation Limit (PQL) study for total and hexavalent chromium in the Grand River according to U.S. EPA guidelines. I gave you copies of pages 22100-22102 from the May 22, 1989 Federal Register showing how U.S. EPA determined the PQL for chromium in finished drinking water, based on standard samples in distilled water. I said we would prepare a study plan for your review and approval before we started

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the study, and solicited your lab's participation. You said that it might well be counterproductive to add the study plan review work to Dr. Tsai's backlog at this time. For that reason, we will hold off on the PQL study to allow a reasonable time for completion of the review of the analytical protocols.

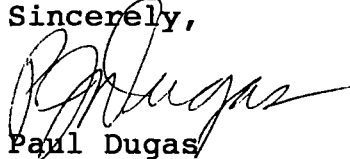
- 3.) It is very difficult to meet ACO QC requirements for the well samples using ACO analytical procedures, particularly in September. In that month, the addition of the two upgradient wells doubles the spike recovery and duplicate analytical QC requirements. We have been making a "good faith" effort to achieve ACO QC requirements by two methods presently. Please review these procedures and let us know if there are additional steps to consider:
 - A.) We re-sample in the event of an initial failure for those parameters which failed QC. Re-sampling is continued weekly until either ACO QC requirements are met, or the end of the well sampling month specified by U.S. EPA (March, June, September, or December) is reached.
 - B.) We studied available analytical methods with their QC requirements and have made recommendations for alternate procedures, following the most current U.S. EPA guidelines. These alternate procedures, once approved by U.S. EPA and incorporated into the ACO, should facilitate consistent production of the best quality environmental monitoring data.
- 4.) I asked about the proposal in the report submitted July 31, 1989 to provide dedicated bailers in all monitoring wells. This would eliminate any potential for cross-contamination among the wells, and the need for bailer wash analyses. You agreed that this was acceptable, and I will try to have these installed before the December, 1989 well sampling.
- 5.) I provided the current casing lip elevations for P-1 and P-2, from which the MSL groundwater elevations are computed. You

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requested the current casing lip elevations for all the monitoring wells, and this data is in the attached table.

Please call me directly at (216) 292-8226 if you have any questions or comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "P. Dugas", written in dark ink.

Paul Dugas
Sr. Environmental Engineer
For: Chemical Land Holdings, Inc.

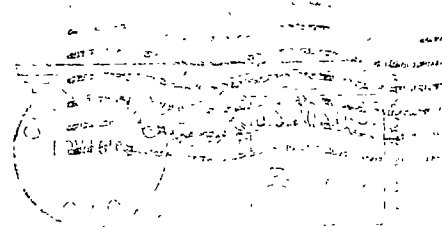
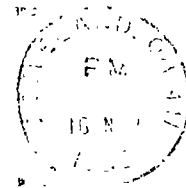
Well/Piezometer Casing Lip Elevations

These are casing lip elevations from which the MSL groundwater elevations may be completed by subtracting the measured depth-to-water.

<u>Well/Piezometer Number</u>	<u>Casing Lip Elevation, Reference MSL, Feet</u>
P-1	618.43
P-2	631.00
1	595.60
1A	595.27
2	617.17
3	593.00
4	585.20
5	616.96
6	622.15
7	622.32
8	578.50
9	579.78
10	581.77
12	581.31
13	579.87

*Well Nos. 11 and 14 dropped from the monitoring program in 1984,
as approved by U.S. EPA.

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